

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL NO.: 3:24-cv-00212-FDW-SCR**

**Ty McBride and Mason Lane
Entertainment LLC,**

Plaintiffs,

v.

**Hank Sacks; Partisan Arts, Inc.; and
Selmona LLC,**

Defendants.

PLAINTIFFS' MOTION TO SEAL

Pursuant to Local Rule 6.1 and the CMO, Plaintiffs move to provisionally seal Exhibits C, D, E, F, and I to their Consolidated Brief in Opposition to Defendants' Motions for Summary Judgment, as set forth below:

1. Plaintiffs are filing a Consolidated Brief in Opposition to Defendants' Motions for Summary Judgment and supporting exhibits.

2. Certain exhibits Plaintiffs are attaching to their Summary Judgment Opposition are documents that non-party Northwood produced in response to a subpoena. Northwood designated the documents confidential under this Court's standing protective order.

3. Those exhibits are:

- Exhibit C: NORTHWOOD0000630-633;
- Exhibit D: NORTHWOOD0000280;

- Exhibit E: NORTHWOOD0000028-29;
- Exhibit F: NORTHWOOD0000298; and
- Exhibit I: NORTHWOOD0000169-170.

4. Due to timing constraints, Plaintiffs were unable to confer with Northwood's counsel about whether Northwood wanted Plaintiffs to seal these exhibits before filing Plaintiffs' Summary Judgment Opposition and exhibits.

5. Plaintiffs do not believe the contents of the exhibits meet the high standard for sealing court filings. Instead, Plaintiffs are filing this Motion out of an abundance of caution until Plaintiffs can confer with Northwood about their position.

6. Plaintiffs will promptly confer with Northwood regarding their position on sealing and provide this information to the Court in a subsequent filing.

WHEREFORE, Plaintiffs request that the Court provisionally seal Exhibits C, D, E, F, and I to Plaintiffs' Summary Judgment Opposition.

June 2, 2025.

/s/ Benjamin S. Chesson
Benjamin S. Chesson, N.C. Bar # 41923
Anna C. Majestro, N.C. Bar # 50850
ALLEN, CHESSON & GRIMES PLLC
505 N. Church Street
Charlotte, North Carolina 28202
Telephone: 704.755.6010
bchesson@allenchesson.com
amajestro@allenchesson.com

*Counsel for Plaintiffs Ty McBride and
Mason Lane Entertainment, LLC*